

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Keith L. Harris,

Plaintiff,

v.

FedEx Freight, Inc., Robert Vandehei,  
Roger Maco, Dave Mills, Kevin McCeady,  
and Mark Courter,

Defendants

No. 1:13-cv-08378

Hon. Judge Elaine E. Bucklo

**COMBINED MOTION TO JOIN ADDITIONAL PLAINTIFFS AND FOR LEAVE  
TO AMEND PLAINTIFF'S COMPLAINT TO ACCOUNT THEREFORE**

Now Come Plaintiff KEITH L. HARRIS, RAFAEL DE LA VEGA, ANTHONY LAKE, TANYA MCLAURIN, STEVEN AYALA, DAVID YANG, LAVELL TYLER, ROBERT MACK, QUINTIN HAMMITTE, LORENZO CADENA, DUANE RUCKER, JOHN COOK, AND OMAR CASAREZ, by and through their attorneys O'Connor | O'Connor, P.C., by Kevin F. O'Connor, respectfully move this Court, pursuant to Rules 20 and 15 of the Federal Rules of Civil Procedure, to join for as additional Plaintiffs all those named above not already a party to this suit; and for leave to file an AMENDED COMPLAINT, a copy of which is attached hereto, to incorporate said additional parties and their claims against Defendants. In support thereof, Plaintiff and said additional parties state as follows:

1. All Moving Parties are current or former employees of FedEx, in its Aurora facility.

2. All Moving Parties were subjected to similar discriminatory treatment in violation of § 1981 of the Civil Rights Act of 1866 by the same Defendants already parties to this civil action.
3. The relief being sought by the Moving Parties arises from the same discriminatory conduct, policies, practices, decisions, transactions, occurrences, and actions by the same Defendants already parties in this civil action.
4. By virtue of the above, the Moving Parties' assertions to rights to relief arise out of the same transaction, occurrence, or series of transactions or occurrences.
5. Because the claims of the Moving Parties arise from the same discriminatory conduct, policies, practices, decisions, transactions, occurrences, and actions, questions of fact will arise which are common to all Moving Parties.
6. Because the discriminatory conduct, policies, practices, decisions, transactions, occurrences, and actions of the current Defendants similarly violated all Moving Parties' rights under §1981, questions of law will arise which are common to all Moving Parties.
7. Plaintiff's current First Amended Complaint will need to be amended to incorporate the additional Moving Parties and their respective discrimination claims.

**WHEREFORE**, Plaintiff Keith L. Harris, Rafael De La Vega, Anthony Lake, Tanya McLaurin, Steven Ayala, David Yang, Lavell Tyler, Robert Mack, Quintin Hammitte, Lorenzo Cadena, Duane Rucker, John Cook, and Omar Casarez respectfully request and that this Court consider the matter raised herein, join them as additional party Plaintiffs, and grant the Moving Parties' leave of Court to amend the Complaint to account therefore.

Respectfully submitted:

Plaintiff Keith L. Harris, Rafael De La Vega, Anthony Lake, Tanya McLaurin, Steven Ayala, David Yang, Lavell Tyler, Robert Mack, Quintin Hammitte, Lorenzo Cadena, Duane Rucker, John Cook, and Omar Casarez;

By: /s/ Kevin F. O'Connor.  
One of their attorneys

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2014, the foregoing document was served this day on all counsel of record identified on the below Service List, via transmission by electronic mail; all parties to this action being authorized to, and currently utilizing, the CM/ECF system for the Northern District of Illinois.

/s/ Kevin F. O'Connor.

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